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April 29, 2025

VIA ECF

The Honorable Naomi Reice Buchwald  
United States District Court Judge  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

**Re: Rina Oh n/k/a Rina Oh Amen v. Virginia L. Giuffre, Case No. 21-cv-8839**

Your Honor:

I am writing on behalf of Virginia Giuffre, Defendant in the above-referenced matter, to respectfully request an adjournment of the upcoming deadline to file a reply in the pending motion for summary judgment, currently scheduled for April 30, 2025, as well as a stay of all proceedings in this matter.

This request is necessitated by the unexpected death of Ms. Giuffre, which occurred on Friday, April 25, 2025. We are in the process of obtaining the death certificate, which we will provide to the Court as soon as it becomes available. With all due candor, we do not have an estimated time frame for receiving the death certificate due to extenuating circumstances.

Pursuant to Federal Rule of Civil Procedure 25(a)(1), a motion for substitution of the proper party must be made within 90 days after service of a statement noting the death. Given these circumstances, we respectfully request:

1. An adjournment of the current deadline to file our reply in support of the motion for summary judgment;
2. A stay of all proceedings in this matter until the time of the identification of the appropriate representative of the deceased's estate; and
3. Permission to submit a status report to the Court within 30 days regarding the estate administration process and the potential appointment of a personal representative who may be substituted as a party.

We have conferred with opposing counsel regarding this application, and all parties are in agreement that an adjournment and stay of proceedings are appropriate under these unfortunate circumstances.

We thank the Court for its consideration of this matter and are available at the Court's convenience should Your Honor have any questions or require additional information.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Kathleen R. Thomas, Esq.

*cc: All counsel of record (via ECF)*